

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

David B. Kinney,

Plaintiff,

v.

Case No. 2025-cv-004014

LIFE TIME, INC.,  
LIFE TIME FITNESS, INC.,  
LTF REAL ESTATE CMBS II, LLC,  
LTF CLUB OPERATIONS COMPANY, INC.,  
LIFE TIME DIGITAL, LLC,

Defendant(s),

**DEFENDANTS' AGREED MOTION  
FOR EXTENSION OF FACT DISCOVERY EXTENSION**

NOW COME Defendants, Life Time, Inc., f/k/a Life Time Fitness, Inc. ("Life Time"), LTF Real Estate CMBS II, LLC ("LTF Real Estate"), LTF Club Operations Company, Inc. ("LTF Club Operations"), and Life Time Digital, LLC ("Life Time Digital"), by and through their attorneys, LITCHFIELD CAVO LLP, and for their Motion for a Forty-Five (45) Day Extension of Fact Discovery, up to and including January 30, 2026, state as follows:

1. Pursuant to the Court's Minute Order dated June 17, 2025 (ECF No. 15), adopting the parties' Joint Status Report (ECF No. 14), fact discovery in this matter is currently set to close on December 16, 2025.
2. Written discovery has been exchanged, and the parties anticipate that additional discovery, including depositions, will be required to complete fact discovery.
3. The requested extension will permit the parties sufficient time to complete outstanding written discovery and to schedule and conduct depositions in an orderly manner.

4. The requested extension will permit the parties to complete fact discovery, including depositions, in an orderly manner and without prejudicing the existing expert disclosure or dispositive motion deadlines.

5. The requested forty-five (45) day extension is modest, is sought in good faith, and will not unduly delay the progression of this case.

6. Plaintiff has been consulted and does not oppose this request.

WHEREFORE, Defendants respectfully request that this Court extend the deadline for closure of fact discovery by forty-five (45) days, up to and including, January 30, 2026.

Respectfully submitted,

By: /s/ Zachary G. Stillman

Zachary G. Stillman

LITCHFIELD CAVO LLP

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#### **CERTIFICATE OF SERVICE**

The undersigned certifies that on December 16, 2025, I electronically filed the foregoing document, Motion for Extension of Fact Discovery with the Clerk of the Court for the Northern District of Illinois by using the CM/ECF system.

/s/Zachary G. Stillman

Zachary G. Stillman

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